

KENNETH DAVIDSON, JR.

DOCKET NUMBER: 11-09458

VERSUS

OFFICE OF WORKER'S COMPENSATION  
DISTRICT 03

NORTHROP GRUMMAN

STATE OF LOUISIANA

---

DEPOSITION OF THOMAS FARMER

Taken June 7, 2012

commencing at 9:04 a.m.

206 East University Street

Siloam Springs, Arkansas

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REPORTED BY: SHEILA B. ALEXANDER, CCR, RMR, CRR  
Certified Court Reporter

APPEARANCES

ON BEHALF OF THE CLAIMANT:

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ON BEHALF OF THE RESPONDENT:

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Also Present:

Mr. and Mrs. Davidson (Via Telephone)

## I N D E X

## TESTIMONY BY THOMAS FARMER

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1                                   THOMAS FARMER,  
2   having been first duly cautioned and sworn by me to  
3   testify to the truth, the whole truth, and nothing but the  
4   truth, testified on his oath as follows, to wit:

5                                   DIRECT EXAMINATION

6   BY MR. LEWIS:

7   Q.     Mr. Farmer, good morning. This is Christian Lewis.  
8   I'm the attorney for Kenneth Davidson.

9             We're taking your deposition by telephone. You are  
10   in Arkansas, obviously, and we are in Lafayette,  
11   Louisiana, and I want the record to reflect that.

12            Present here today in our conference room is Mr. and  
13   Mrs. Davidson and also the attorney for Northrop Grumman.  
14   His name is Mr. Christopher Trahan. And after I get  
15   through, he may have some questions for you.

16            What I'd like to first start with is if you would  
17   please identify your name and your address.

18   A.     Yes. It's Thomas Farmer. I'm a Florida resident.  
19   1119 Harbor Lane, Gulf Breeze. And my permanent mailing  
20   address here in Arkansas that I use is 819 South  
21   Washington, Siloam Springs.

22   Q.     And how old are you, Mr. Farmer?

23   A.     I'm 62.

24   Q.     And what is your profession?

25   A.     I've been a commercial pilot most of my life.

1 Q. And are you currently employed with anyone?

2 A. No.

3 Q. Who was the last employer that you worked with?

4 A. Northrop Grumman.

5 Q. And how long did you work with Northrop Grumman?

6 A. I believe about three, four years, approximately.

7 Q. And were you employed with Northrop Grumman in May  
8 of 2011?

9 A. Yes.

10 Q. Mr. Davidson has filed with the Louisiana workers'  
11 compensation office a claim asserting injuries that  
12 resulted from a flight that occurred in May of 2011. And  
13 one of the reasons that we're here today is to get  
14 information about that flight.

15 I'm told that you were the pilot of the flight where  
16 an incident occurred involving fumes. Is that correct?

17 A. Yes, sir.

18 Q. And was the date that this incident occurred  
19 May 31st, 2011?

20 A. Yes, sir.

21 Q. In your own words, could you describe for us what  
22 happened on that date?

23 A. Well, we made the flight. Of course, prior to that  
24 flight, a different pilot had flown the plane and  
25 complained of the fumes and smoke and said, "The airplane



1 needs to be fixed, shouldn't be flown anymore," and he  
2 basically said he wasn't going to fly it anymore. So --

3 Q. Was that Bill O'Connor?

4 A. Yes, sir.

5 And so Ken Davidson and myself were asked to go fly  
6 a flight a few days later to verify those smoke and fumes  
7 which they knew the airplane was making. We really didn't  
8 want to do it, but, you know, it's your -- when it's your  
9 job, you -- most of the time an employer, especially our  
10 managers, pressed the issue pretty -- pretty hard to go  
11 ahead and fly the plane.

12 And about -- well, as soon as you get in the plane,  
13 you smell the smoke and fumes, but we went ahead and  
14 flew -- flew the mission or attempted to. And about --  
15 oh, right after takeoff, you know, the fumes were there.  
16 The smoke came later.

17 But during -- during that one-hour flight or, you  
18 know, a little over an hour, after we got up to altitude  
19 and -- I think 28,000 feet, the -- the smoke and fumes  
20 were so bad that burning eyes, coughing, and more  
21 difficulty breathing.

22 I asked Ken how he was feeling, and of course, he  
23 was -- appeared to me to be about, you know, halfway  
24 intoxicated. And I -- I told him, I said, "I don't feel  
25 competent with the safety of the flight anymore," and we

1 were going to abort the flight.

2 I contacted ATC. We got an immediate descent.  
3 Because at that altitude, the smoke and fumes are a lot  
4 stronger than they are at a lower altitude. So we got the  
5 airplane down as soon as we could, depressurized the  
6 cabin, tried to clear the smoke. I used oxygen as much as  
7 I could, because I was kind of concerned about how -- how  
8 safe I would be and if we could even make it to the  
9 airport.

10 But we did find our way back to the airport, landed.  
11 And to be honest with you, I -- neither one of us, Ken or  
12 myself, can remember how we got back to the hotel from the  
13 airport.

14 And we reported that incident to our supervisors  
15 back at Northrop Grumman in Peachtree City. And they --  
16 the best I can remember, they was kind of disgusted, you  
17 know, because they really expected us to continue flying  
18 the plane and discredit the previous pilot's report.

19 And from then on, we were kind of treated like  
20 traitors to the company.

21 But Ken, I know, was at that time -- I can't think  
22 of the word to describe it, but he was kind of out of it,  
23 and I think both of us were pretty well overwhelmed by the  
24 fumes.

25 Q. Where did that flight that you and Mr. Davidson have

1 originate?

2 A. In Schenectady, just out of Albany, New York.

3 Q. That's in -- that's in New York; correct?

4 A. Yes, sir.

5 Q. And do you have the identifiers for that particular  
6 plane that you were flying?

7 A. It's November 690 echo hotel.

8 Q. And what kind of plane was it?

9 A. That's a -- designated an AC-90. It's a Turbo  
10 Commander.

11 Q. And do you know the manufacturer?

12 A. Originally Rockwell Commander, and I think they've  
13 been in and out of the manufacturing business, and I think  
14 Air Research -- I'm not sure who's responsible for the  
15 airframe at this point.

16 Q. Where were you and Mr. Davidson relative to one  
17 another while the flight was going? I, obviously, presume  
18 that you're in the pilot seat. Where was Mr. Davidson  
19 located?

20 A. He's about three-quarters of the way back in the  
21 cabin to the rear.

22 Q. And is there any divider or separator or door that  
23 separates where you were from from Mr. Davidson?

24 A. No. It's -- it's an open cabin and cockpit  
25 configuration. And actually, Mr. Davidson sits in the



1 area where the -- those smoke and fumes first enter the  
2 cabin.

3 Q. And approximately in feet how far away would he have  
4 been from where you were flying the airplane?

5 A. Oh, 10 -- 10 feet maybe.

6 Q. Do you at this time know what the source of the  
7 fumes were?

8 A. Well, they're -- there's only one source of air to  
9 come into the cabin, and that's through the -- excuse  
10 me -- the bleed air system. The -- the airplane is  
11 pressurized, heat and air, off from bleed air from the  
12 engines. It goes through what's called an air cycle  
13 machine where -- with an evaporator and condensers and  
14 turned into pressurized air and, of course, heating and  
15 cooling. And there is no -- there is no other air source.

16 Q. Do you know what was causing the fumes on that  
17 flight?

18 A. Yeah. It -- I'd been flying that airplane for  
19 almost three years previous to that, and we constantly  
20 complained about the smoke and the fumes.

21 It's -- it's a common problem with those airplanes  
22 and most all airplanes that use the TPE331 engines.  
23 The -- if there's any -- any kind of oil leakage around  
24 the engine seals or around the engine inlet, that oil is  
25 introduced directly into the bleed air.

1           Of course, after high temperature and pressure  
2 and -- breaks down -- that oil back down into  
3 organophosphates, tricresyl phosphates, which are highly  
4 toxic. And that air goes into the air cycle machine,  
5 which if it's malfunctioning, further contaminates the air  
6 with fumes and smoke.

7           And in that airplane's condition it was in at the  
8 time will overheat the ductwork and further irritate the  
9 situation with basically the cooked materials in that  
10 ductwork, which even adds a whole new array of -- of  
11 chemicals and by-products of being overheated.

12           When you're at the higher altitude where it can be,  
13 you know, minus 20 degrees would require more heat and  
14 more air for the pressurization. And at some point, that  
15 system in that aircraft will use direct bleed air into the  
16 cabin without going through the air cycle machine to  
17 augment the cabin pressurization and heat.

18           And for a long time, which we complained about and  
19 it never was fixed, the temperature control would go full  
20 hot and basically just, like I said, cook the ductwork and  
21 overheat everything, and that's where you get the smoke,  
22 also.

23           So that pretty much, I think, summarizes the -- the  
24 source. And there is no other source for heat, air,  
25 smoke, and the fumes.

1 Q. How long do you estimate that you and Mr. Davidson  
2 were exposed to these fumes on that flight of May 31st,  
3 2011?

4 A. From the time we got in the cabin. I mean those --  
5 that -- those materials are kind of impregnated in the  
6 interior of the aircraft from previous flights, so from  
7 the time we got in the cabin till -- till we landed, which  
8 was I think -- I'd have to look at the logbooks, but I  
9 think it was over an hour, probably an hour and a half, a  
10 good hour and a half of exposure.

11 Q. You mentioned that people knew about this problem.  
12 Who was it that knew about this particular problem before  
13 this flight that you -- that you know of firsthand?

14 A. Our managers. Dennis Monday; probably the fleet  
15 manager; the chief pilot, Matt Boone; the ops manager, Dan  
16 Burke; and most all the pilots and operators in the  
17 company knew of the smoke and fumes that were involved  
18 with that airplane.

19 Some of them just got to the point they refused to  
20 fly in it because of the -- but it -- but everybody in the  
21 maintenance department was aware of the airplane. And  
22 then in our management, they were -- they were informed  
23 almost daily, practically every flight about the -- you  
24 know, the fumes and the smoke that I would complain about  
25 as well as the other pilots, also.



1 Q. Now, during this particular flight, did you  
2 personally witness any symptoms or problems that  
3 Mr. Davidson was experiencing? I think you indicated that  
4 you felt like he appeared to be intoxicated. Describe  
5 what -- what you witnessed.

6 A. Rubbing his eyes a little bit.

7 And to back up. Since we were on kind of a  
8 verification test flight to verify the other pilot's  
9 report, I told -- I told Mr. Davidson to write down his  
10 notes if he would, you know, how he felt through the  
11 flight. I did the same. As, you know, most anybody in  
12 that kind of business does.

13 But his eyes were -- I could tell his eyes were  
14 burning; mine were. So he, you know, was coughing a  
15 little bit. And as we got to the higher altitude, you  
16 know, then you could see that oily mist come in the cabin,  
17 which it always did. And just kind of a burning sensation  
18 in your lungs, feeling like you -- real bad taste in your  
19 mouth.

20 You can't -- you can't think as well. I think I --  
21 when I looked around and saw, after two or three times,  
22 Ken just sort of dazing out the -- out the window, I knew  
23 he wasn't able to do his job very well, and I was already  
24 to the point where I -- I really was uncomfortable in the  
25 airplane, and I knew he was feeling the same thing I was.



1 So we -- I told him we were calling it off and going home.

2 Q. Are you aware of any testing that was done on this  
3 particular airplane after this flight?

4 A. I wasn't -- I wasn't there when the air test took  
5 place, but I wanted -- I had been wanting an air test done  
6 on the airplane for a long time, which they wouldn't --  
7 didn't feel like doing.

8 But at this point, you know, we grounded the  
9 airplane and re -- you know, just refused to fly it. It  
10 had to be fixed before anybody was going to fly it  
11 anymore. Of course, they said they were fixing it and  
12 never did, but...

13 Q. I'm told and I think I've seen a document that  
14 indicates Northrop Grumman ran some perhaps environmental  
15 tests and weren't able to identify any kind of problem. I  
16 don't know if you had heard that or read the information  
17 along those lines. Have you?

18 A. Yeah. We -- me and the other pilot were told in a  
19 meeting -- we never were shown or given copies of the air  
20 quality test, but we were told there was nothing wrong  
21 with it, that there was no -- no oil or chemicals or, you  
22 know, carbon monoxides, everything was well below the  
23 acceptable standards.

24 But there is no standard for testing the air inside  
25 of an aircraft. I always felt like that test was -- was

1 irrelevant, because it didn't pertain really to -- to a  
2 small cabin in an airplane where you have to have good  
3 fresh air. It's not like a machine shop where you expect  
4 to be exposed to oil.

5 And even the test later, I was told, did say there  
6 was an oily mist in the air, and we were told by  
7 supervisors that the air was clean and there was no oily  
8 mist or smoke.

9 Q. Are you familiar with a gentleman named John Probst?

10 A. Yes. He's our maintenance -- or he was the  
11 maintenance director for Northrop in Peachtree City at  
12 that time.

13 Q. Do you know what, if any, role he had in -- in  
14 investigating this particular incident?

15 A. Well, it's directly his responsibility to ensure  
16 the -- the safety and the quality of the aircraft that we  
17 fly. He's directly responsible for -- for all the  
18 maintenance.

19 Q. Since this incident, have you had any kind of  
20 ongoing problems as a result of it?

21 A. Yes, I'm afraid so. The -- the same problems  
22 I've -- that I've talked with other people about. It's  
23 the sometimes inability to think clearly, headaches all  
24 the time, feeling of intoxication a lot, fatigue far more  
25 than -- fatigue and depression more than -- than in a lot

1 of cases, and a little short-term memory loss and just --  
2 just generally not being able to think and solve problems  
3 as well as -- as you would before being exposed to these  
4 organophosphates.

5 Q. Has Northrop Grumman or its insurer provided you any  
6 kind of medical care at this point?

7 A. After the -- after that flight on May 31st, yes,  
8 some doctor visits. And then I don't -- I'm not sure what  
9 Ken's status is. But mine, the worker comp company, after  
10 I called them, I said I needed to see -- continue some  
11 work with a doctor in Pensacola and another doctor in San  
12 Francisco. She kind of laughed at me, said, "No, we're  
13 not going to give you any authorizations for any more  
14 doctor visits at all." And I said, "Well, you know,  
15 before you guys said that the doctor visits were your  
16 responsibility." And she just kind of laughed and said,  
17 "No, you're -- we're not going to do anything for you."

18 Q. Was this Ms. Jean Gallina, I believe?

19 A. No. Jean Gallina, the Northrop Grumman nurse, she  
20 referred me to the Chartis caseworker for me. I can't  
21 remember her name, but -- but it was the worker comp nurse  
22 that told me that I wasn't going to get any more help from  
23 worker comp.

24 Q. Have you been able to return to piloting and to work  
25 since this incident?



1 A. No. No, I've pretty much taken myself out of  
2 commercial aviation. I really don't feel safe in the  
3 aircraft anymore.

4 Q. Has Northrop Grumman provided you any kind of  
5 substitute wage benefit -- we call it indemnity benefits  
6 here in Louisiana, but any kind of substitute wage  
7 benefits since you haven't been able to work as a pilot?

8 A. No. They've been pretty much unresponsive, every --  
9 everyone in the company that I've tried to talk with.

10 Q. Have you been able to return to any form of work at  
11 this point?

12 A. No.

13 Q. Mr. Farmer, I think that's all the questions I have  
14 at this point.

15 Mr. Trahan, the attorney for Northrop Grumman, may  
16 have some questions for you. I believe the office that  
17 we're borrowing today will have to use the conference room  
18 at 10 o'clock, so I'm going to turn the questions over to  
19 Mr. Trahan at this point.

20 A. Okay.

21 CROSS EXAMINATION

22 BY MR. TRAHAN:

23 Q. Mr. Farmer.

24 A. Yes, sir.

25 Q. This is Chris Trahan. I'm Northrop Grumman's



1 attorney.

2 Did you ever fly that particular aircraft again  
3 after May 21st of 2011?

4 A. Yes. We were -- we were told by Dennis Monday, Matt  
5 Boone, supervisors, to take the aircraft back to  
6 Peachtree; we wouldn't be flying it on missions anymore;  
7 and -- but the only way that I told them we would fly the  
8 plane is on two hops and at low altitude unpressurized  
9 without the use of any heat or air. So yeah, we -- the  
10 next day, June the 1st, we did return the aircraft to  
11 Peachtree for maintenance.

12 Q. And did you ever fly the aircraft again after  
13 June 1st of 2011?

14 A. I flew the airplane several times after it was --  
15 after I was told that it -- the cabin air problems were  
16 fixed.

17 Q. And did you have any more problems, or at least did  
18 you have problems as bad as what you had on May 31st?

19 A. I think the first test flight after that, it was --  
20 it was the same. The smoke, the oily -- the oily air, the  
21 smoke and fumes did come into the cabin. And this went  
22 on, I think, maybe a half dozen times.

23 And Bill O'Connor, the other pilot, flew, I think, a  
24 couple of those test flights as well as I did. And I only  
25 remember one flight afterwards, maybe three months later,

1 that all the equipment was replaced, every -- new  
2 ductwork, and the air did -- was acceptable at that time.  
3 But almost immediately and on the later flights, the  
4 problem reoccurred.

5 Q. Are you saying that -- okay. I'm kind of confused  
6 here. Are you saying roughly three months after this  
7 incident, you recall one flight when they had changed all  
8 the ductwork and the system seemed to operating correctly;  
9 is that what you're saying?

10 A. Well, it was operating not -- not completely clean  
11 like it should be, but it was, I thought, acceptable.

12 But within a couple of weeks of work, the equipment  
13 all went -- went bad again. The ducts overheated. The  
14 air cycle machine was bringing the smoke and the fumes and  
15 the oily mist back into the airplane. And eventually it  
16 was grounded permanently.

17 Q. How long did you continue to fly for Northrop  
18 Grumman after this incident of May 31st, 2011?

19 A. I stayed with them from -- from May 31st to January  
20 the 17th and flew a twin piston engine plane a few flights  
21 and probably, oh, maybe 50 hours -- flight hours or so.

22 But -- but at -- I can't remember exactly when, what  
23 the date was, but the 690 echo hotel, the Turbo Commander,  
24 was grounded at that time permanently.

25 Q. Okay. But you're telling me that even after you

1    ceased flying six niner zero echo hotel, you did fly some  
2    twin-engine -- twin piston-engine Cessna aircraft for  
3    Northrop Grumman; is that correct?

4    A.     Yes, but with -- but not -- not in the same capacity  
5    that I'd flown previously.

6    Q.     How was the capacity different?

7    A.     Well, the workload is significantly less in the  
8    piston twins. The job -- job's much easier.

9           But I still felt the same symptoms. The symptoms  
10   that Ken Davidson and I experienced never did completely  
11   go away. And it was on my mind throughout that whole  
12   period if I really should be flying the airplane or not.

13           I did consult with a couple of doctors and discussed  
14   the issue with them, and they said: "You -- you know,  
15   your heart's good. You can walk and talk. It's up to  
16   you. But when you don't feel safe in the airplane  
17   anymore, you've got to make that decision to -- to stop."  
18   And that's the decision I made later.

19           But even on those flights after May 31st, I never  
20   did feel comfortable as -- as I did previously.

21   Q.     You say you last worked for Northrop Grumman  
22   January 17, 2012. Did you voluntarily leave, or were you  
23   laid off because of a lack of work?

24   A.     The -- they said it was a lack of work. I was  
25   actually trying to get -- I was wanting to go to work in



1 the UAV part of their aviation, but never -- never had any  
2 luck with that. But yeah, it was -- it was -- we were  
3 told it was due to lack of work.

4 Q. Okay. And have you applied for any flying jobs  
5 since you were laid off by Northrop Grumman?

6 A. No.

7 Q. Have you taken any -- what class of medical  
8 certificate did you have at the time of this incident?  
9 Did you have a second class or a first class?

10 A. Second.

11 Q. And have you been back to have a renewal of your  
12 second class medical certificate since May 31st of 2011?

13 A. Yes. I think it was last month. But it was -- and  
14 I discussed with the doctor the condition that we were in.

15 Q. And did you have to get a second class certificate  
16 again or not?

17 A. Yes, I've got -- I do have a certificate now.

18 Q. And where -- you saw an AMB, that's an aviation  
19 medical examiner, for your physical; is that correct?

20 A. Yes.

21 Q. Where was he located?

22 A. It's in the Occupational Health Center of  
23 Springdale, Arkansas.

24 Q. And you say he did, in fact, give you a second class  
25 certificate; is that right?



1 A. Yes.

2 Q. You mentioned that the engine in this particular  
3 type of aircraft is a TPE331; is that correct?

4 A. The engine, yes.

5 Q. I'm sorry. Go ahead, sir.

6 A. Yeah, that's the engine, yes.

7 Q. And you said something about, is this correct, that  
8 these particular engines, in your -- at least in your  
9 opinion, have a particular problem with oil leaking past  
10 the seals and causing fumes in the cabin. Is that your  
11 opinion?

12 A. Yeah. I've flown the airplanes quite a bit in the  
13 past, MU-2s and Commanders and some Dornier turboprop  
14 aircraft. They basically all use the same air cycle  
15 machine configuration. And once they have a -- an engine  
16 seal problem or a degradation in the air cycle machine  
17 itself, they produce smoke and fumes.

18 Q. Okay. What I want to find out from you here is I  
19 gather you're saying this has been your experience with  
20 those particular class of engines on this aircraft and  
21 other aircraft using those engines, but have you read any  
22 literature produced by the manufacturers or anything else  
23 that would tell you that -- or support your position that  
24 these engines are particularly prone to this type of  
25 problem?

1 A. Yeah, I've read -- I can't -- I can't quote or tell  
2 you exactly what I've read when or where, but I have read  
3 documentation and talked to a lot of maintenance people,  
4 even the -- the maintenance people that have worked on 690  
5 echo hotel for many years.

6 Russell Hampton in Oklahoma City, he -- he  
7 identified that problem and said it had -- was common in  
8 existence.

9 Q. Can you identify anybody else by name who's told you  
10 that was a common problem with these engines?

11 A. Reese Howell in Tennessee that was flying MU-2s and  
12 331 engines for many, many years. Bob Kidd, Tulsa,  
13 Oklahoma, who ran a 331 engine shop for a long time.  
14 Peter Schiff who designed a completely different air cycle  
15 machine system is familiar, and I've talked with him about  
16 it, so it's -- but -- and there's probably a half a dozen  
17 others. I can't remember at the time.

18 Q. Okay. Have you -- when's the last time you actually  
19 flew any airplane as a pilot in command, sir, either for  
20 commercial purposes or otherwise?

21 A. In the Commander or any aircraft?

22 Q. Any airplane, even a small Cessna. When was the  
23 last time you actually, you know, hands-on flew an  
24 airplane?

25 A. I think -- I think that last flight was with

1 Northrop probably in Oc -- you know, maybe  
2 October-November of 2011.

3 Q. Okay. So you've not actually flown -- either for  
4 commercial purposes or for recreation or whatever, you've  
5 not actually flown any aircraft for more than a year now;  
6 is that correct?

7 A. No, not a year.

8 Q. I'm sorry. You're right. What -- let's say more  
9 than five or six months. I miscalculated there. Is that  
10 correct?

11 A. Well, my last flight was with -- was with -- in a  
12 Northrop Grumman airplane. And, you know, like I say, I  
13 think it was, you know, around November of 2011. So yeah,  
14 it's -- that's maybe six months.

15 Q. Okay. And sir, let me say I've got some of your  
16 medical records because I am Northrop Grumman's attorney.  
17 There was a request made of Mr. Davidson's attorney for  
18 any information I have. I could not give him your medical  
19 records without your consent, and I don't want to do that.

20 I guess my question at this point is, Would you have  
21 any opposition to my giving Mr. Davidson's attorney copies  
22 of medical records I've got for you post this particular  
23 incident? At least I've got records -- I've got reports  
24 from Dr. Jerome Lang and Dr. Mario Oliveira. Do you  
25 have -- again, it's up to you, sir, whether I can give



1 these records or not. I just want to find out whether you  
2 have an opposition to me giving him these records or not.

3 MR. LEWIS: I don't know if I've  
4 necessarily requested them. I'll make a  
5 decision on that whether or not I need those or  
6 not.

7 So Mr. Farmer, from my standpoint, you  
8 don't need to answer that question. I haven't  
9 really requested your medical records. I'll  
10 speak with Mr. Davidson and see if we need them,  
11 but don't feel obligated to make them available  
12 to me at this time. I'm not sure whether or not  
13 I even need them for Mr. Davidson's purposes.

14 THE WITNESS: That sounds fine with me. I  
15 really don't feel in a position to authorize any  
16 transfer of documents.

17 Q. (Mr. Trahan continued.) Okay. That's fine, sir.

18 Are you employed in any capacity at this point,  
19 Mr. Farmer?

20 A. No.

21 Q. Look at my notes for a second, sir.

22 I think that's all. Thank you, sir.

23 REDIRECT EXAMINATION

24 BY MR. LEWIS:

25 Q. One last question, Mr. Davidson. Is there any doubt



1 in your mind that the fumes that you were exposed to in  
2 the flight on May 31st, 2011, has resulted in the injuries  
3 and problems that you've already described?

4 A. Was that for Mr. Davidson or me?

5 Q. No. That's for -- that's Christian Lewis asking you  
6 a question on behalf of Mr. Davidson. Do you have any  
7 doubt in your mind that the fumes that you were exposed to  
8 has caused the problems that you've suffered from?

9 A. That's -- that's -- yeah, I agree. I'm sure of it,  
10 because I have no other previous exposure to chemicals or  
11 anything like that. That's -- I'm sure -- I'm absolutely  
12 sure that that's the cause of my problems and probably Ken  
13 Davidson, as well.

14 Q. Thank you, sir. I don't have any more questions.

15 And I think you -- at least in Louisiana, you have a  
16 right to read and sign your deposition. And I'd ask that  
17 if the court reporter would send a copy of this deposition  
18 to you so that you would have the opportunity to review it  
19 and, if necessary, if there's been any errors in  
20 transcribing your testimony, that you be allowed to, on an  
21 errata sheet, make any such corrections. And then at that  
22 point, you can return that sheet to the court reporter,  
23 and she can include those changes and sheet with the final  
24 copy of the deposition.

25 MR. LEWIS: Is that all right with you,

1 Ms. Alexander?

2 THE REPORTER: Yeah, that's fine.

3 MR. LEWIS: Okay. And as far as -- we  
4 would like a copy of the deposition,  
5 Ms. Alexander, and you have my contact  
6 information. And I presume Mr. -- Mr. Trahan  
7 says that he does, also.

8 (Wherein, Deposition Exhibit 1 was marked.)

9 (Whereupon, at 9:41 a.m., the deposition was concluded.)

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